

United States District Court  
Southern District of Texas  
FILED

MAY 18 2021

Nathan Ochsner, Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

ALEJANDRO MARTINEZ  
VICTOR VALLEJO

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§  
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§

Criminal No. M - 21 - 1022

INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about December 2019 and continuing up to and including the date of the return of the indictment, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

ALEJANDRO MARTINEZ  
and  
VICTOR VALLEJO

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count Two

On or about February 25, 2021, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALEJANDRO MARTINEZ  
and  
VICTOR VALLEJO**

did knowingly and unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in interstate and foreign commerce by extortion, in that the defendant ALEJANDRO MARTINEZ unlawfully obtained approximately \$1,500 in United States Currency not due him or his office from an individual with his consent induced by color of official right, in exchange for providing protection for a vehicle the defendant believed was transporting five (5) or more kilograms of cocaine in the Southern District of Texas.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**Count Three**

From on or about March 4, 2021 to on or about March 10, 2021, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALEJANDRO MARTINEZ  
and  
VICTOR VALLEJO**

did knowingly and unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in interstate and foreign commerce by extortion, in that the defendant ALEJANDRO MARTINEZ unlawfully obtained approximately \$1,500 in United States Currency not due him or his office from an individual with his consent induced by color of official right, in exchange for providing protection for a vehicle the defendant believed was transporting five (5) or more kilograms of cocaine in the Southern District of Texas.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

A TRUE BILL

FOREPERSON

JENNIFER B. LOWERY  
ACTING UNITED STATES ATTORNEY

Robert Wills Jr.  
ASSISTANT UNITED STATES ATTORNEY